

## A Team Approach to Information Policy Development

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**Background.** The increased use of computer-based information management technologies is a trigger for development of more comprehensive information management policies and procedures. Organizations are recognizing the need for enterprise-wide policies governing the management of information and knowledge to complement existing policies for the management of other key resources, e.g., human, financial, and property. In addition, health care-related organizations are facing critical issues in the handling of confidential patient information<sup>1</sup> and focused emphasis on information management in the standards of the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).<sup>2</sup>

Vanderbilt University Medical Center (VUMC) is using a phased approach for developing and implementing a robust framework of information management policies. In late 1992, an Information Policy Advisory Committee was formed to oversee strategic decisions and policy formation and to develop longer term (3-5 year) strategic plans in the broad arena of information management.<sup>3</sup> In early 1996, IPAC established an Information Policy Support Team (IPST) to develop and coordinate VUMC-wide review of new and revised policies concerning confidentiality, security, and other priority information management issues.

This poster describes the overall policy framework developed by the IPST, key issues addressed in the formation of individual policies, the education and communication processes designed to support the policies, and the integrated review process required to establish enterprise-wide policies in VUMC's complex environment.

**Methodology.** The members of IPST are chosen to provide broad functional representation for the key stakeholders within VUMC: School of Medicine, School of Nursing, Biomedical Sciences, Vanderbilt Medical Group, Vanderbilt University Hospital, and Vanderbilt Health Services. IPST also includes representatives of key staff functions: Financial Management, Risk Management, Human Resource Services, General Counsel, and the Informatics Center.

IPST's initial task was to refine a straw man set of overarching policy objectives and to set priorities for initial policy development. Our current set of policy objectives provides high-level statements of intent within each of the following areas:

- Information Policy Formation
- Processes/Outcomes/Evaluation
- Informed Consent
- Protection of Data and Systems
- Dissemination of Information
- Information Management Architecture
- Data Stewardship/Accuracy/Sharing
- Knowledge-based Resources/Intellectual Property
- Information Management Processes and Applications
- Facilitating Use

The policy objectives include all of the high level JCAHO standards for management of information; they are restated, however, to broaden their applicability to the entire medical center.

The IPST identified three areas of focus for the initial year of policy development: protection of data and systems, data stewardship/accuracy/sharing, and information management processes and applications.

Policy review and approval is accomplished through an enterprise-wide consensus building process. Members of the IPST provide initial input from their organizational units. Key members then act as liaisons to present, advocate for, and, when necessary, negotiate changes in the draft policies.

### References

1. Barrows BC, Clayton PD. Privacy, confidentiality, and electronic medical records. *JAMIA*, 1996;3(2):139-148.
2. JCAHO. 1996 Comprehensive Accreditation Manual for Hospitals; 1995.
3. Olsen AJ, Baker WL, Sittig DF, Stead WW. A planning process for a fast track to IAIMS. *Proc 17th SCAMC* (1993). McGraw-Hill 1994:544-548.